

U.S. Postal Regulatory Commission  
901 New York Avenue NW, Suite 200  
Washington, DC 20268-0001

P.O. Box 48148  
Seattle, WA. 98148  
February 28, 2018

RE: 10-Year Rate System Review  
Docket No. RM2017-3  
Order No. 4258

Dear Commissioners,

I am writing to you as a 31-year postal employee and a local union official, on behalf of my co-workers. It is my opinion that the changes proposed to rate-setting are an improvement, but do not go far enough in allowing the Postal Service to adjust rates to raise needed funds for infrastructure improvement and equipment upgrades.

From personal experience, I have seen the negative impacts of underfunding on postal operations, especially regarding equipment that we use.

For hand-held scanners in the office where I work, which is in the Seattle Installation, Seattle District, Western Area, we have three of the old-style black scanners for in-office use, as the others have died. They frequently lose power when we are doing bulk scanning of parcels received from customer, and we lose as many as 50 or more scans at a time. Sometimes we can backtrack and re-scan those parcels, which is inefficient; other times the acceptance scan is lost, which hurts customer service.

#### Postal Rolling Stock: Old, Not Serviced, Therefore Inefficient

The rolling stock we use to move the mail is old, not well maintained, and often in short supply. For example, the buggies we use, sometimes called “1075s” - think shopping carts – are at least 20 years old, and falling apart with no replacements apparently forthcoming. The canvas is stained, frayed, or totally gone on most of that equipment. The wheels have not been lubricated, and are often misaligned (no maintenance or repairs ever appears to be done), so that these are a pain to use, in fact are inefficient to use. I used to push these out to the collection boxes across the street from where I work, to place the collection containers full of mail inside and wheel back to work. Now I skip using the buggies and carry or drag the mail from across the street, because it is faster and less effort than using the rolling stock.

Once, a grocery cart was abandoned in front of our station. As I wheeled it across the station floor, I noticed how effortlessly it glided along with literally just a push of the finger, quite a contrast with the effort required to push much of our rolling stock.

The large, heavy metal containers, called “OTRs” or “BMCs” weigh around 475 pounds empty. Often, problems with the wheels or brakes mean that it is very difficult to push them, even before loading any mail into them. This makes pushing them, in retail units which lack motorized tuggers, slower and more difficult.

Similarly, GPMCs are often missing one of the four latches used to hold the webbing up when the container is closed, or the webbing is torn, or the plastic backing is broken and missing, limiting the usefulness of the individual piece. It is so commonplace, that no one asks for a work order for repair, except perhaps when the rollaway brake is not working, or another such clear safety hazard is present.

### Equipment Shortages

Rolling stock is often in short supply, especially during peak season, when repeated calls to order empty hampers or GPMCs yield no results. Equipment shortages cause many inefficiencies, especially in handling and sorting parcels, from double-handling mail, using equipment that is not best suited to the task, delays in completing sortation (which delays carriers being able to start their daily deliveries, often generating overtime). Often large parcels are manually sorted and stacked in piles by carrier route – carrying individual parcels is time-consuming and avoidable, with sufficient equipment.

### Staffing Issues

Financial belt-tightening has given postal management the incentive to cut jobs, in ways that hamper good customer service, including timely delivery within service standards. A recent example is the shift from forwarding parcels in centralized units (CFS) to the Remote Forwarding System implemented in delivery units.

The additional work does not seem to have generated additional workhours. Many retail units in this area have substantial backlogs of mail that needs to be either forwarded or returned to the sender. The local postmaster stated that he expected that to be done within an eight hour tour of day, i.e., without generating overtime.

Of course, shortstaffing of retail service can result in long lines of customers, which is harmful to customer relations and to revenue. Many offices have no one to answer phones at various times of the day. I once helped a customer who called from the other side of town with a service issue. I asked why he called my office. He said, “you were the only office to answer the phone.”

### Summary

I have witnessed the inefficiencies and service issues which stem from insufficient postal revenue, which the rate cap put in place by the 2006 PAEA exacerbated. I believe the Commission's proposal is an improvement, but is too limited. It does not give the Postal Service sufficient flexibility to make rate increases where necessary, to generate capital to maintain infrastructure and invest in modernizing technology, and to maintain financial stability.

David C. Yao

davidc.yao @ comcast.net